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Attorneys for: Defendant JIA LUN SHAO a/k/a ANDY SHAO

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN DOE,

Plaintiff,

vs.

JIA LUN SHAO a/k/a ANDY SHAO
and

JINGYUN WANG a/k/a VIVIAN WANG,

Defendants.

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ANSWER

Case Action No: 2:24-cv-09972

Defendant Jia Lun Shao a/k/a Andy Shao (herein "Shao") says by way of Answer to Plaintiff's (herein "PLAINTIFF") Complaint as follows:

PRELIMINARY STATEMENT

1. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one (1) of Plaintiff's Complaint.

2. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two (2) of Plaintiff's Complaint.

3. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph three (3) of Plaintiff's Complaint.

4. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph four (4) of Plaintiff's Complaint.

5. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph five (5) of Plaintiff's Complaint.

6. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph six (6) of Plaintiff's Complaint.

7. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seven (7) of Plaintiff's Complaint.

8. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eight (8) of Plaintiff's Complaint.

9. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph nine (9) of Plaintiff's Complaint.

10. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph ten (10) of Plaintiff's Complaint.

11. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eleven (11) of Plaintiff's Complaint..

12. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twelve (2) of Plaintiff's Complaint.

13. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirteen (13) of Plaintiff's Complaint.

14. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fourteen (14) of Plaintiff's Complaint.

15. Shao admits the first sentence of paragraph fifteen (15) with regard to Vivian Jingyun Wang's (herein "Wang") employment. Shao is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph fifteen (15) of Plaintiff's Complaint.

16. Shao admits the first sentence of paragraph sixteen (16) with regard to his employment. Shao denies the remaining allegations contained in paragraph sixteen (16) of Plaintiff's Complaint.

17. Shao admits the first sentence of paragraph seventeen (17) with regard to Wang's relocation. Shao is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph seventeen (17) of Plaintiff's Complaint.

18. Shao denies the allegations contained in paragraph eighteen (18) of the Complaint.

19. Shao is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph nineteen (19) of Plaintiff's Complaint.

20. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the first sentence paragraph twenty (20) of the Complaint with regard to Miss X's employment. Shao denies the remaining allegations in paragraph twenty (20) of Plaintiff's Complaint.

21. Shao denies the allegations contained in paragraph twenty-one (21) of Plaintiff's Complaint.

22. Shao denies the allegations contained in paragraph twenty-two (22) of Plaintiff's Complaint.

23. Shao denies the allegations contained in paragraph twenty-three (23) of Plaintiff's Complaint.

24. Shao denies the allegations contained in paragraph twenty-four (24) of Plaintiff's Complaint.

25. Shao denies the allegations contained in paragraph twenty-five (25) of Plaintiff's Complaint.

26. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-six (26) of the Complaint.

27. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-seven (27) of Plaintiff's Complaint.

JURISDICTION AND VENUE

28. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-eight (28) of Plaintiff's Complaint.

29. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph twenty-nine (29) of Plaintiff's Complaint.

30. Shao denies the allegations contained in paragraph thirty (30) of Plaintiff's Complaint.

31. Shao denies the allegations contained in paragraph thirty-one (31) of Plaintiff's Complaint.

32. Shao admits that email address Lucy116503@gmail.com referenced in subpart b of paragraph thirty-two (32) is his. Shao denies the remaining allegations contained in paragraph thirty-two of Plaintiff's Complaint.

33. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-three (33) of Plaintiff's Complaint.

34. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-four (34) of Plaintiff's Complaint.

FACTUAL ALLEGATIONS

Vivian Jingyun Wang Meets and Begins Acting Inappropriately Toward Plaintiff

35. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-five (35) of Plaintiff's Complaint.

36. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-six (36) of Plaintiff's Complaint.

37. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-seven (37) of Plaintiff's Complaint.

38. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-eight (38) of Plaintiff's Complaint.

39. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph thirty-nine (39) of Plaintiff's Complaint.

40. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty (40) of Plaintiff's Complaint.

41. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-one (41) of Plaintiff's Complaint.

42. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-two (42) of Plaintiff's Complaint.

43. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-three (43) of Plaintiff's Complaint.

44. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-four (44) of Plaintiff's Complaint.

45. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-five (45) of Plaintiff's Complaint.

In September 2023, Vivian Jingyun Wang Requested Plaintiff Represent Her at the Annual Performance Roundtable

46. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-six (46) of Plaintiff's Complaint.

47. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-seven (47) of Plaintiff's Complaint.

48. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-eight (48) of Plaintiff's Complaint.

49. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph forty-nine (49) of Plaintiff's Complaint.

50. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty (50) of Plaintiff's Complaint.

51. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-one (51) of Plaintiff's Complaint.

52. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-two (52) of Plaintiff's Complaint.

53. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-three (53) of Plaintiff's Complaint.

54. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-four (54) of Plaintiff's Complaint.

Vivian Jingyun Wang Inappropriately Accessed Her Rating Outcome in October 2023 and Blamed Plaintiff for What She Considered a "Disappointingly Fair" Result

55. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-five (55) of Plaintiff's Complaint.

56. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-six (56) of Plaintiff's Complaint.

57. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-seven (57) of Plaintiff's Complaint.

58. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-eight (58) of Plaintiff's Complaint.

59. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph fifty-nine (59) of Plaintiff's Complaint.

Vivian Jingyun Wang Informed Plaintiff in Late-October 2023 of Her Intention to Relocate to the U.S. Office for Her Planned Marriage

60. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty (60) of Plaintiff's Complaint.

61. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-six (61) of Plaintiff's Complaint.

62. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-two (62) of Plaintiff's Complaint.

**Vivian Jingyun Wang Quiet Quit while Awaiting Relocation
and Began Retaliating Against Plaintiff in November 2023**

63. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-three (63) of Plaintiff's Complaint.

64. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-four (64) of Plaintiff's Complaint.

65. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-five (65) of Plaintiff's Complaint.

66. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-six (66) of Plaintiff's Complaint.

67. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-seven (67) of Plaintiff's Complaint.

68. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-eight (68) of Plaintiff's Complaint.

69. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph sixty-nine (69) of Plaintiff's Complaint.

70. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy (70) of Plaintiff's Complaint.

71. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy-one (71) of Plaintiff's Complaint.

72. Shao denies the allegations contained in paragraph seventy-two (72) of Plaintiff's Complaint.

Defendants Sent Their First Blast E-Mail on December 20, 2023

73. Shao denies the allegations contained in paragraph seventy-three (73) of Plaintiff's Complaint.

74. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy-four (74) of Plaintiff's Complaint.

75. Shao denies the allegations contained in paragraph seventy-five (75) of Plaintiff's Complaint.

**Defendants Sent Their Second Blast E-mail on January 4,
2024 and Then a Series of Targeted Harassing
E-mails within the Month**

76. Shao denies the allegations contained in paragraph seventy-six (76) of Plaintiff's Complaint.

77. Shao denies the allegations contained in paragraph seventy-seven (77) of Plaintiff's Complaint.

78. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy-eight (78) of Plaintiff's Complaint.

79. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph seventy-nine (79) of Plaintiff's Complaint.

80. Shao denies the allegations contained in paragraph eighty (80) of Plaintiff's Complaint.

81. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eighty-one (81) of Plaintiff's Complaint.

82. Shao denies the allegations contained in paragraph eighty-two (82) of Plaintiff's Complaint.

83. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eighty-three (83) of Plaintiff's Complaint.

84. Shao denies the allegations contained in paragraph eighty-four (84) of Plaintiff's Complaint.

85. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eighty-five (85) of Plaintiff's Complaint.

86. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eighty-six (86) of Plaintiff's Complaint.

87. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eighty-seven (87) of Plaintiff's Complaint.

88. Shao denies the allegations contained in paragraph eighty-eight (88) of Plaintiff's Complaint.

89. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eighty-nine (89) of Plaintiff's Complaint.

90. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph ninety (90) of Plaintiff's Complaint.

**Defendants Sent More Blast E-mails in Late-February 2024
to Desperately Resuscitate Their Failing Scheme**

91. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph ninety-one (91) of Plaintiff's Complaint.

92. Shao denies the allegations contained in paragraph ninety-two (92) of Plaintiff's Complaint.

93. Shao denies the allegations contained in paragraph ninety-three (93) of Plaintiff's Complaint.

94. Shao denies the allegations contained in paragraph ninety-four (94) of Plaintiff's Complaint.

95. Shao denies the allegations contained in paragraph ninety-five (95) of Plaintiff's Complaint.

96. Shao denies the allegations contained in paragraph ninety-six (96) of Plaintiff's Complaint.

97. Shao denies the allegations contained in paragraph ninety-seven (97) of Plaintiff's Complaint.

98. Shao denies the allegations contained in paragraph ninety-eight (98) of Plaintiff's Complaint.

99. Shao denies the allegations contained in paragraph ninety-nine (99) of Plaintiff's Complaint.

**Defendants Relentlessly Attacked Those Who Vindicated
Plaintiff until April 2024**

100. Shao denies the allegations contained in paragraph one hundred (100) of Plaintiff's Complaint.

101. Shao denies the allegations contained in paragraph one hundred-one (101) of Plaintiff's Complaint.

102. Shao denies the allegations contained in paragraph one hundred-two (102) of Plaintiff's Complaint.

103. Shao denies the allegations contained in paragraph one hundred-three(103) of Plaintiff's Complaint.

104. Shao denies the allegations contained in paragraph one hundred-four (104) of Plaintiff's Complaint.

105. Shao denies the allegations contained in paragraph one hundred-five (105) of Plaintiff's Complaint.

106. Shao denies the allegations contained in paragraph one hundred-six (106) of Plaintiff's Complaint.

Defendants Initially Attempted to Harass Miss X and Plaintiff's Girlfriend into Turning Against Plaintiff

107. Shao denies the allegations contained in paragraph one hundred-seven (107) of Plaintiff's Complaint.

108. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-eight (108) of Plaintiff's Complaint.

109. Shao denies the allegations contained in paragraph one hundred-nine (109) of Plaintiff's Complaint.

110. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-ten (110) of Plaintiff's Complaint.

111. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-eleven (111) of Plaintiff's Complaint.

112. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-twelve (112) of Plaintiff's Complaint.

113. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-thirteen (113) of Plaintiff's Complaint.

114. Shao denies the allegations contained in paragraph one hundred-fourteen (114) of Plaintiff's Complaint.

115. Shao denies the allegations contained in paragraph one hundred-fifteen (115) of Plaintiff's Complaint.

**Defendants Later Retaliated Against
Miss X for Whistleblowing**

116. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-sixteen (116) of Plaintiff's Complaint.

117. Shao denies the allegations contained in paragraph one hundred-seventeen (117) of Plaintiff's Complaint.

118. Shao denies the allegations contained in paragraph one hundred-eighteen (118) of Plaintiff's Complaint.

119. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred-nineteen (119) of Plaintiff's Complaint.

**Defendants Attacked Miss X and Plaintiff out of Shame Rage
After Their Scheme Had Failed**

120. Shao denies the allegations contained in paragraph one hundred-twenty (120) of Plaintiff's Complaint.

121. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred twenty-one (121) of Plaintiff's Complaint.

122. Shao denies the allegations contained in paragraph one hundred twenty-two (122) of Plaintiff's Complaint.

123. Shao denies the allegations contained in paragraph one hundred twenty-three (123) of Plaintiff's Complaint.

124. Shao denies the allegations contained in paragraph one hundred twenty-four (124) of Plaintiff's Complaint.

125. Shao denies the allegations contained in paragraph one hundred twenty-five (125) of Plaintiff's Complaint.

126. Shao denies the allegations contained in paragraph one hundred twenty-six (126) of Plaintiff's Complaint.

127. Shao denies the allegations contained in paragraph one hundred twenty-seven (127) of Plaintiff's Complaint.

128. Shao denies the allegations contained in paragraph one hundred twenty-eight (128) of Plaintiff's Complaint.

129. Shao denies the allegations contained in paragraph one hundred twenty-nine (129) of Plaintiff's Complaint.

130. Shao denies the allegations contained in paragraph one hundred thirty (130) of Plaintiff's Complaint.

131. Shao denies the allegations contained in paragraph one hundred thirty-one (131) of Plaintiff's Complaint.

132. Shao denies the allegations contained in paragraph one hundred thirty-two (132) of Plaintiff's Complaint.

133. Shao denies the allegations contained in paragraph one hundred thirty-three (133) of Plaintiff's Complaint.

134. Shao denies the allegations contained in paragraph one hundred thirty-four (134) of Plaintiff's Complaint.

**Defendants' Allegations Are Categorically False and
Published with Actual Malice**

135. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred twenty-five (135) of Plaintiff's Complaint.

136. Shao denies the allegations contained in paragraph one hundred thirty-six (136) of Plaintiff's Complaint.

137. Shao denies the allegations contained in paragraph one hundred thirty-seven (137) of Plaintiff's Complaint.

138. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred thirty-eight (138) of Plaintiff's Complaint.

139. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred thirty-nine (139) of Plaintiff's Complaint.

140. Shao denies the allegations contained in paragraph one hundred thirty-four (140) of Plaintiff's Complaint.

141. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-one (141) of Plaintiff's Complaint.

142. Shao denies the allegations contained in paragraph one hundred thirty-five (142) of Plaintiff's Complaint.

143. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-three (143) of Plaintiff's Complaint.

144. Shao denies the allegations contained in paragraph one hundred thirty-four (144) of Plaintiff's Complaint.

145. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-five (145) of Plaintiff's Complaint.

Plaintiff Has Suffered Devastating, Worldwide Harm to His Reputation and Career and Continues to Live in Unease

146. Shao denies the allegations contained in paragraph one hundred forty-six (146) of Plaintiff's Complaint.

147. Shao denies the allegations contained in paragraph one hundred thirty-seven (147) of Plaintiff's Complaint.

148. Shao denies the allegations contained in paragraph one hundred forty-eight (148) of Plaintiff's Complaint.

149. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred forty-nine (149) of Plaintiff's Complaint.

150. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty (150) of Plaintiff's Complaint.

151. Shao denies the allegations contained in paragraph one hundred fifty-one (151) of Plaintiff's Complaint.

152. Shao denies the allegations contained in paragraph one hundred fifty (152) of Plaintiff's Complaint.

153. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty-three (153) of Plaintiff's Complaint.

154. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty-four (154) of Plaintiff's Complaint.

155. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty-five (155) of Plaintiff's Complaint.

156. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred fifty-six (156) of Plaintiff's Complaint.

157. Shao denies the allegations contained in paragraph one hundred fifty-seven (157) of Plaintiff's Complaint.

158. Shao denies the allegations contained in paragraph one hundred fifty-eight (158) of Plaintiff's Complaint.

159. Shao denies the allegations contained in paragraph one hundred fifty-nine (159) of Plaintiff's Complaint.

160. Shao denies the allegations contained in paragraph one hundred sixty (160) of Plaintiff's Complaint.

FIRST CAUSE OF ACTION
(Defamation)

161. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred sixty (160) of Plaintiff's Complaint.

162. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred sixty-one (161) of Plaintiff's Complaint.

163. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred sixty-two (160) of Plaintiff's Complaint.

164. Shao denies the allegations contained in paragraph one hundred sixty-four (164) of Plaintiff's Complaint.

165. Shao denies the allegations contained in paragraph one hundred sixty-five (165) of Plaintiff's Complaint.

166. Shao denies the allegations contained in paragraph one hundred sixty-six (166) of Plaintiff's Complaint.

167. Shao denies the allegations contained in paragraph one hundred sixty-seven (167) of Plaintiff's Complaint.

168. Shao denies the allegations contained in paragraph one hundred sixty-eight (168) of Plaintiff's Complaint.

169. Shao denies the allegations contained in paragraph one hundred sixty-nine (169) of Plaintiff's Complaint.

170. Shao denies the allegations contained in paragraph one hundred seventy (170) of Plaintiff's Complaint.

171. Shao denies the allegations contained in paragraph one hundred seventy-one (171) of Plaintiff's Complaint.

172. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-two (172) of Plaintiff's Complaint.

173. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-three (173) of Plaintiff's Complaint.

SECOND CAUSE OF ACTION
(Defamation Per Se)

174. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-four (174) of Plaintiff's Complaint.

175. Shao denies the allegations contained in paragraph one hundred seventy-five (175) of Plaintiff's Complaint.

176. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-six (176) of Plaintiff's Complaint.

177. Shao denies the allegations contained in paragraph one hundred seventy-seven (177) of Plaintiff's Complaint.

178. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-eight (178) of Plaintiff's Complaint.

**THIRD CAUSE OF ACTION
(False Light Invasion of Privacy)**

179. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred seventy-nine (179) of Plaintiff's Complaint.

180. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred eighty (180) of Plaintiff's Complaint.

181. Shao denies the allegations contained in paragraph one hundred eighty (180) of Plaintiff's Complaint.

182. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred eighty-two (182) of Plaintiff's Complaint.

183. Shao denies the allegations contained in paragraph one hundred eighty-three (183) of Plaintiff's Complaint.

184. Shao denies the allegations contained in paragraph one hundred eighty-four (184) of Plaintiff's Complaint.

185. Shao denies the truth of the allegations contained in paragraph one hundred eighty-five (185) of Plaintiff's Complaint.

186. Shao denies the allegations contained in paragraph one hundred eighty-six (186) of Plaintiff's Complaint.

187. Shao denies the allegations contained in paragraph one hundred eighty-seven (187) of Plaintiff's Complaint.

188. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred eighty-eight (188) of Plaintiff's Complaint.

FOURTH CAUSE OF ACTION
(Publicity Given to Private Life)

189. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred eighty-nine (189) of Plaintiff's Complaint.

190. Shao denies the allegations contained in paragraph one hundred ninety (190) of Plaintiff's Complaint.

191. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred ninety-one (191) of Plaintiff's Complaint.

192. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred ninety-two (192) of Plaintiff's Complaint.

193. Shao denies the allegations contained in paragraph one hundred ninety-three (193) of Plaintiff's Complaint.

194. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred ninety-four (194) of Plaintiff's Complaint.

FIFTH CAUSE OF ACTION
(Aiding and Abetting Defamation)

195. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred ninety-five (195) of Plaintiff's Complaint.

196. Shao denies the allegations contained in paragraph one hundred ninety-six (196) of Plaintiff's Complaint.

197. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph one hundred ninety-seven (197) of Plaintiff's Complaint.

198. Shao denies the allegations contained in paragraph one hundred ninety-eight (198) of Plaintiff's Complaint.

199. Shao denies the allegations contained in paragraph one hundred ninety-nine (199) of Plaintiff's Complaint.

200. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred (200) of Plaintiff's Complaint.

SIXTH CAUSE OF ACTION
(Tortious Interference with Contract/Prospective
Economic Advantage)

201. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred-one (201) of Plaintiff's Complaint.

202. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred-two (202) of Plaintiff's Complaint.

203. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred-three (203) of Plaintiff's Complaint.

204. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred-four (204) of Plaintiff's Complaint.

205. Shao denies the allegations contained in paragraph two hundred-five (205) of Plaintiff's Complaint.

206. Shao denies the allegations contained in paragraph two hundred-six (206) of Plaintiff's Complaint.

207. Shao denies the allegations contained in paragraph two hundred-seven (207) of Plaintiff's Complaint.

208. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred-eight (208) of Plaintiff's Complaint.

209. Shao is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph two hundred-nine (209) of Plaintiff's Complaint.

PRAYER FOR RELIEF

WHEREFORE, Defendant Shao demands judgment dismissing Plaintiff's Complaint in the above matter.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

The Court does not have jurisdiction over this matter and/or the Shao and Shao reserves the right to move to dismiss this matter due to lack of jurisdiction.

SECOND DEFENSE

The Court does not have jurisdiction over the subject matter of this suit and Shao reserves the right to move to dismiss this matter due to lack of jurisdiction.

THIRD DEFENSE

Plaintiff's claim is barred by applicable statutes of limitation.

FOURTH DEFENSE

Plaintiff's Complaint fails to state a claim upon which relief can be granted.

FIFTH DEFENSE

Plaintiff's claim is barred by the doctrine of unclean hands and other principles of equity.

SIXTH DEFENSE

Plaintiff's claim is unenforceable because any alleged statements made by Shao are either not defamatory, or are true or substantially true, or are of such a nature that they cannot be shown to be either true or false.

SEVENTH DEFENSE

Plaintiff's claim is unenforceable because any alleged statements made by Shao are matters of public concern, were made without actual or common law malice, and with a subjective belief in their truth.

EIGHTH DEFENSE

There is no basis in law or fact for Plaintiff's claim for punitive damages.

NINTH DEFENSE

Plaintiff's alleged damages were caused by the fault of a third party for which Shao has no responsibility and over which he has no control.

TENTH DEFENSE

Plaintiff's alleged damages were caused by his or her own fault.

ELEVENTH DEFENSE

Plaintiff's alleged damages were a direct result of his or her failure to take reasonable steps to mitigate alleged damages.

**The Law Offices of
ROBERT D. KOVIC, L.L.C.**

By: Robert D. Kovic
Robert D. Kovic, Esq.

Dated: February 21, 2025

JURY DEMAND

Shao hereby demands a trial by jury as to all issues.

**The Law Offices of
ROBERT D. KOVIC, L.L.C.**

By: Robert D. Kovic
Robert D. Kovic, Esq.

Dated: February 21, 2025

CERTIFICATION PURSUANT TO RULE 11.2

The undersigned hereby certifies that to the best of the undersigned's information, knowledge and belief, the within action is not presently the subject of any other action pending in any court or of a pending arbitration proceeding to date, nor is any other action or arbitration proceeding contemplated at this time.

**The Law Offices of
ROBERT D. KOVIC, L.L.C.**

By: Robert D. Kovic
Robert D. Kovic, Esq.

Dated: February 21, 2025